



Land and Chemicals Division

Type of Document: ☐ Notice of Violation and Inspection Report/Checklist
☐ No Violation Letter and Inspection Report/Checklist
☒ Letter of Acknowledgment
☐ Information Request
☐ Pre-Filing and Opportunity to Confer
☐ State Notification of Enforcement Action

Facility Name : Amcor Flexibles, Inc.

Facility Location: 4101 Lien Road

City: Madison State: Wisconsin

U.S. EPA ID# WID 006 115 828

Assigned Staff W. Francis Phone: 312-353-4921

Name	Signature	Date
Author W. Francis	<i>W. Francis</i>	11/30/09
Regional Counsel	-----	
Section Chief P. Little	<i>P. Little</i>	11/30/09
Branch Chief W. Harris	<i>W. Harris</i>	12/1/09

RTC
MG
12/1

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
One copy for the assigned staff;
One copy for the section file;
One copy for the branch file; and
One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.
Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

DEC 01 2009

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF: LR-8J

Mr. Mark Pearson
Manufacturing Director
Amcor Flexibles Healthcare
4101 Lien Road
Madison, Wisconsin 53704

Re: Letter of Acknowledgment
RCRA Compliance Evaluation Inspection
Amcor Flexibles, Inc.
Madison, Wisconsin
WID 006 115 828

Dear Mr. Pearson:

On October 9, 2009, the U.S. Environmental Protection Agency issued Amcor Flexibles, Inc. (Amcor) a Notice of Violation (NOV) which identified violations of the Wisconsin Administrative Code at the 4101 Lien Road, Madison, Wisconsin facility.

EPA received your October 29, 2009, response to the October 9, 2009, NOV regarding the compliance evaluation inspection.

This letter is to inform you that EPA has reviewed your response and determined that additional enforcement action need not be taken at this time.

This position does not limit your liability for compliance with all the applicable provisions of the Resource Conservation and Recovery Act, as amended. Your hazardous waste management operations will continue to be evaluated by EPA and the Wisconsin Department of Natural Resources (WDNR) in the future.

If you have any questions regarding this letter, please contact Walt Francis, of my staff, at (312) 353-4921.

Sincerely,

A handwritten signature in cursive script that reads "Willie H. Harris".

Willie H. Harris, P.E.
Chief, RCRA Branch
Land and Chemicals Division

cc: Cynthia English, WDNR-South Central Office

bcc: Peter Felitti, ORC



Land and Chemicals Division

pub 10-2-8

Type of Document: ☒ Notice of Violation Letter
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Facility Name: Amcor Flexibles, Inc.





Facility Location: 4101 Lien Road

City: Madison

State: Wisconsin

U.S. EPA ID# WID 006 115 828

Assigned Staff W. Francis Phone: 312-353-4921

Name	Signature	Date
Author W. Francis		8/31/09 / newel / newel / 9/15/09 / 9/29/09
Regional Counsel P. Felitti		9/3/09
Section Chief P. Little		10/7/09
Branch Chief W. Harris		10/8/09

RTC MCG
10/16
10/17

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
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 - One copy for the assigned staff;
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6. E-mail staff the date that the letter was received by facility.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

**Mr. Mark Pearson
Manufacturing Director
Amcors Flexibles Healthcare
4101 Lien Road
Madison, Wisconsin 53704**

2. Article Number

(Transfer from service label)

7009 1680 0000 7666 9290

PS Form 3811, March 2001

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

Bobb Friedl

B. Date of Delivery

10-15-09

C. Signature

X Bobb Friedl

☐ Agent☐ Addressee

D. Is delivery address different from item 1?

☐ Yes

If YES, enter delivery address below:

☐ No

3. Service Type

☐ Certified Mail☐ Express Mail☐ Registered☒ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

102595-01-M-1424



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

LR-8J

OCT 09 2009

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Mark Pearson
Manufacturing Director
Amcor Flexibles Healthcare
4101 Lien Road
Madison, Wisconsin 53704

Re: Notice of Violation
RCRA Compliance Evaluation Inspection
Amcor Flexibles, Inc.
WID 006 115 828

Dear Mr. Pearson:

On January 14, 2009, a representative of the U.S. Environmental Protection Agency inspected the Amcor Flexibles, Inc. (Amcor) facility, located at 4101 Lien Road in Madison, Wisconsin. The purpose of the inspection was to evaluate Amcor's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation of hazardous waste, universal waste and used oil. Please find enclosed a copy of the inspection report for your reference. In addition, EPA received e-mail information from Amcor on January 15, 2009, January 28, 2009, and January 30, 2009.

Based on information provided by Amcor personnel, review of records, and personal observations by the inspector, EPA finds that Amcor is engaged in the management of hazardous waste without a hazardous waste storage license, and is in violation of certain requirements of the authorized Wisconsin Administrative Code (WAC) (1998 ed.) and the United States Code of Federal Regulations (CFR). To be eligible for the exemption from the requirement to obtain a hazardous waste storage license, Amcor must be in compliance with the conditions of WAC § NR 615.05(4)(a) [40 CFR § 262.34]. Specifically, we find that Amcor is in noncompliance with the following conditions for a storage license exemption, and in violation of the following requirements:

1. In order to avoid the need for a hazardous waste storage license, a large quantity generator must label or mark clearly each container and tank with the words "Hazardous Waste".

See, WAC § NR 615.05(4)(a)(10)¹ [40 CFR § 262.34(a)(3)]. In addition, a large quantity generator must ensure that the date upon which each period of accumulation begins shall be clearly marked and visible for inspection on each container. See, WAC § NR 615.05(4)(a)(5) (40 CFR § 262.34(a)(2)).

During the inspection of the “Solvent Storage Area”, the inspector observed two 55-gallon containers. One of the 55-gallon containers was labeled “Ink Waste” but did not include an accumulation date or the words “Hazardous Waste”. In addition, during the inspection of the “Clean Up Room”, the inspector observed an accumulation tank for waste solvent and ink, which was not labeled hazardous waste. Amcor, therefore, failed to comply with the labeling requirements of WAC § NR 615.05(4)(a)(10) (40 CFR § 262.34(a)(3)); to mark the accumulation date on the container and tank as required by WAC § NR 615.05(4)(a)(5) (40 CFR § 262.34(a)(2)); and failed to satisfy the conditions for a storage license exemption.

2. In order to avoid the need for a hazardous waste storage license, a large quantity generator must comply with the contingency plan and emergency procedures in WAC § NR 630.22. See, WAC § NR. 615.05(4)(a)(6) [40 CFR § 262.34(a)(4)]. Specifically, a copy of the contingency plan and all revisions of the plan must be sent to all local police departments, fire departments, hospitals, and emergency response teams who may be called to provide emergency services. See, WAC § NR 630.22(1)(b)(2) [40 CFR § 265.53(b)].

During the records review portion of the inspection, Inspector Francis asked about the distribution of the Contingency Plan. Amcor personnel told the inspector that the Contingency Plan had been distributed to the fire department. At the time of the inspection, Amcor had not distributed the Contingency Plan to the police department, local hospital, and emergency response team. Amcor, therefore, failed to comply with the requirements of WAC § NR 630.22(1)(b)(2) [40 CFR § 265.53(b)], and failed to satisfy one of the conditions for a storage license exemption.

3. In order to avoid the need for a hazardous waste storage license, a large quantity generator must comply with the satellite accumulation requirements in WAC § NR 615.05(4)(c) [40 CFR § 262.34(c)(1)]. See, WAC § NR. 615.05(4)(c)(1) through (7) [40 CFR § 262.34(c)(1)]. A generator without a storage license may accumulate as much as 55 gallons of hazardous waste, or one quart of acutely hazardous waste listed in WAC § NR 605.09(2)(a), table II or (b), table III, or identified in WAC § NR 605.09(3)(b), table IV, in containers at or near any point of generation under the control of the generator of the waste where wastes initially accumulate if certain requirements are met. See, WAC § NR 615.05(4)(c)(1) through (7) [40 CFR § 262.34(c)(1)]. Specifically, a generator shall mark the containers either with the words “Hazardous Waste” or with other words that identify

¹ The State of Wisconsin regulations applicable to large quantity generators are currently codified at WAC NR ss. 662.010 to 662.043. However, the regulations which were part of the federally-authorized RCRA program in Wisconsin are those Wisconsin Administrative Code regulations that were in effect on May 19, 1998, at the time of the inspection.

the contents of the containers. See, WAC § NR 615.05(4)(c)(5) [40 CFR § 262.34(c)(1)(ii)].

During the inspection of the Clean Up Room, Inspector Francis observed a 55-gallon SAA container of distillation unit sludge that was not labeled. Amcor personnel told the inspector that the distillation unit sludge is shipped off-site as a hazardous waste. Amcor therefore failed to comply with the labeling requirements of WAC § NR 615.05(4)(c)(5) [40 CFR § 262.34(c)(1)(ii)], and failed to satisfy one of the conditions for a storage license exemption.

4. In order to avoid the need for a hazardous waste storage license, a large quantity generator that accumulates hazardous waste in tanks, must comply with the tank system requirements of WAC Chapter 645, except the provisions of WAC §§ NR 633.07, 645.06, 645.15, 645.16, and 645.17(1)(a)(3). The generator shall meet certain requirements such as: 1) perform daily inspections of overfill controls, spill control equipment and above ground portions of the tank; 2) record the inspections in a log; 3) have secondary containment; 4) have a leak detection system; 5) perform an annual leak test and maintain documentation of test; 6) perform a written tank assessment reviewed and certified by an independent, qualified, registered professional engineer; 7) ensure incompatible waste will not be placed in the same tank; 8) label the tank with the words "Hazardous Waste"; and 9) storage tanks which contain volatile waste shall be operated in compliance with all appropriate air management rules contained in WAC Chapters NR 400 to 499, regarding the control of organic compound emissions. See, WAC § NR 615.05(4)(a)(3) [40 CFR § 262.34(a)(1)(ii)].

During the inspection of the "Clean Up Room", the inspector observed a tank utilized to accumulate hazardous waste prior to distillation. Amcor was not complying with any of the applicable hazardous water tank requirements listed above. Amcor, therefore, failed to comply with the tank requirements of WAC § NR 615.05(4)(a)(3) (40 CFR § 262.34(a)(1)(ii)), and failed to satisfy the conditions for a storage license exemption.

5. A large quantity generator who accumulates hazardous waste on-site for 90 days or less, and who does not meet the conditions for a license exemption of WAC §§ NR 615.05(6) and 615.05(4), and 40 CFR §§ 262.34(a)(1)(i) and (ii), is an operator of a hazardous waste storage facility, and is required to obtain a Wisconsin hazardous waste storage license, and a EPA Subpart CC storage permit. See, WAC §§ NR 615.05(6)(a) and (b), 680.21(1), 680.30, 680.31, and 680.32(2); and 40 CFR §§ 262.34(a), 270.1(c), and 270.10(a),(d). Upon failing to comply with the conditions for a permit exemption, Amcor became an operator of a hazardous waste storage facility, and was required to apply for and obtain a hazardous waste storage license. Amcor's failure to apply for and obtain a hazardous waste storage license violated the licensing requirements of WAC §§ NR 680.30, 680.31, and 680.32; and the permitting requirements of 40 CFR §§ 270.1(c) and 270.10(a), (d).
6. Used oil generators are subject to all applicable Spill Prevention Control and

Countermeasures requirements (40 CFR Part 112) in addition to the requirements of WAC Chapter 590 Subchapter II and 40 CFR Part 279, Subpart C. Containers and aboveground storage tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil." See, WAC § NR 590.13(4)(a) [40 CFR § 279.22(c)(1)].

During the inspection of the Maintenance Shop, the inspector observed four 55-gallon containers used to accumulate used oil. The containers were labeled with the words "Waste Oil". Amcor failed to label or mark all the containers with the words "Used Oil." Amcor therefore violated the used oil container labeling requirement. Persons managing used oil should have complied with WAC Chapter 590 (Note now codified at WAC NR 679) [40 CFR Part 279]. In your January 15, 2009, e-mail you included a photograph of the used oil containers with the labels changed to read "Used Oil".

At this time, EPA is not requiring Amcor to apply for a Wisconsin storage license, so long as it immediately establishes compliance with the conditions for an exemption outlined above. Under Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

However, please be advised that Amcor's compliance with the conditions and requirements described above will not relieve Amcor of its liability for the violations identified in this letter. EPA reserves the right to bring further enforcement actions (including an action for civil penalties) against Amcor for the violations identified in this letter.

You should submit your response to Walt Francis, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Walt Francis, of my staff, at (312) 353-4921.

Sincerely,



Willie H. Harris, P.E.
Chief, RCRA Branch
Land and Chemicals Division

Enclosures

cc: Cynthia English, WDNR-South Central Regional Office

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME: AMCOR FLEXIBLES, INC.
FACILITY U.S. EPA ID NO.: WID 006 115 828
FACILITY TYPE: Large Quantity Generator
FACILITY ADDRESS: 4101 Lien Road
Madison, Wisconsin 53704
U.S. EPA REPRESENTATIVE: Walt Francis
DATE OF INSPECTION: January 14, 2009
SIC CODE: 2671 - Packaging Paper and Plastics Film, Coated and Laminated
NAICS CODES: 32221 - Coated and Laminated Packaging Paper Manufacturing
32222 - Paper Bag and Coated and Treated Paper Manufacturing
322222 - Coated and Laminated Paper Manufacturing

PREPARED BY: Walt Francis
Walt Francis
Environmental Scientist

2/2/09
Date

ACCEPTED BY: Paul Little
Paul Little, Chief
Compliance Section 2
RCRA Branch

2-2-09
Date

Purpose of Inspection

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) at Amcor Flexibles, Inc. (Amcor) located at 4101 Lien Road, Madison, Wisconsin to determine compliance with the Resource Conservation and Recovery Act (RCRA) and the Wisconsin Administrative Code (WAC), with respect to Amcor's management of hazardous waste, universal waste and used oil.

Participants

United States Environmental Protection Agency (U.S. EPA) Inspector -
Walt Francis, Environmental Scientist

Representatives of Amcor Flexibles, Inc. -
Mark Pearson, Manufacturing Director
Joel Wall, Shipping/Warehouse Manager

Site Description/Background Information

The Amcor Flexibles Healthcare facility is located at 4101 Lien Road, Madison, Wisconsin and is a printer of coated paper and film based flexible packaging. Amcor has five flexible printing plants in the United States located in: Ashland, Massachusetts; Hagerstown, Maryland; Mt. Holly, New Jersey; Mundelein, Illinois; and Madison, Wisconsin. The general process steps at the Amcor, Madison, Wisconsin facility may include printing on coated paper or flexible packaging, and cleaning the presses/rollers/trays with shop rags with reclaimed solvent, and water based cleaners for water based inks. Amcor has 5 printing presses and a laminator. Shop towels and rags are accumulated in 55-gallon containers and sent off-site for laundering to Industrial Towel and Uniform (ITT), Madison, Wisconsin. In addition, ink pans are cleaned out in a clean up room area with a reclaimed solvent blend. The waste inks have been characterized as a F003/F005 hazardous waste. The clean up room contains a solvent washing tank, a 55-gallon drum washer, a distillation unit, a reclaimed solvent tank, and a used solvent tank prior to distillation. The metal rotogravure print rollers are manufactured off-site. In addition, the maintenance department collects used oil in 55-gallon containers and used fluorescent lamps. Amcor has been at this location since 1979.

At the time of the inspection, the Amcor facility was operating as large quantity generator (LQG) of hazardous waste, and operates one RCRA hazardous waste less than 90 day accumulation area for containers. Historical hazardous waste streams have included F003/F005 spent non-halogenated solvents, D001 ignitable waste, and D035 methyl ethyl ketone waste. Other wastes include: 1) used fluorescent lamps; 2) used oil; and 3) used shop towels. WDNR provided U.S. EPA with a copy of a December 2, 2008, "Hazardous Waste Manifest Records For Selected Generator" report for the period 1/1/2005 through 12/2/2008, for out-bound shipments of hazardous waste from the Amcor, Madison, Wisconsin facility. The WDNR out-bound manifest

report indicated that hazardous waste is shipped to Badger Disposal of Wisconsin, Inc. (WID 988 580 056), Milwaukee, Wisconsin as the transporter, approximately one shipment every month. For the period October 7, 2008, through October 8, 2007, Amcor made 14 shipments ranging from 5,963 pounds to 17,180 pounds of hazardous waste. The Amcor, Madison, Wisconsin facility has approximately 135 employees and operate three shifts.

Opening Conference

U.S. EPA representative Walt Francis arrived at the Amcor facility at approximately 9:45 a.m. Inspector Francis introduced himself to Mr. Mark Pearson, Manufacturing Director. Mr. Pearson took the inspector to a conference room. Inspector Francis presented his credentials to Mr. Pearson, and informed him of the nature, scope, and procedures of the inspection. Mr. Joel Wall, Shipping/Warehouse Manager arrived at the conference room. The inspection was conducted by U.S. EPA. WDNR personnel declined to participate in the inspection with U.S. EPA. Mr. Pearson provided Inspector Francis with a brief overview of the facility, and provided information on the various hazardous waste, universal waste, and solid wastes that are generated, and shipped off-site from Amcor. Specifically, Mr. Pearson explained that waste areas include cleaning of printing cylinders, spent lacquer thinner, and spent ink at the printing presses. Mr. Pearson explained that clean up solvents utilized in the plant include: "Film Clean", "BIX Cleaner", "Film Cleaner", "40/90 Blend", acetone, methanol, toluene, ethyl acetate, spray aerosols for contact cleaner, and penetrating oils. Clean up of ink pans is done in the clean up room, where Amcor has a solvent washing unit, and a 55-gallon drum solvent washing unit, which are all hard piped to a holding tank, a distillation apparatus, and a recovered solvent tank. Distillation bottoms/sludge is collected in 55-gallon containers and shipped off-site as a hazardous waste. Mr. Pearson explained that the reclaimed solvent from the distiller is made up of primarily the components of the three solvent totes used for ink mixing, which include: ethylene acetate; n-propyl acetate/methyl ethyl ketone; ethyl acetate/n-propyl acetate; isopropyl alcohol; n-propyl acetate; and glycol ether. Amcor also generates an ignitable solvent based adhesive waste and an aqueous non-hazardous ink waste. In addition, Mr. Pearson explained that used oil is collected in 55-gallon containers and used fluorescent lamps, are accumulated in the maintenance shop. Inspector Francis reviewed several recent out-bound hazardous waste manifests records, information from the 2005 and 2007 Biennial Reports database and discussed the operation of the facility. Inspector Francis noted that the outbound tracking report indicated off-site shipments of F005 spent non-halogenated solvents, a F006 electroplating sludge, and a D003 reactive waste shipment. Inspectors Francis asked Mr. Pearson about off-site shipments of used oil. Mr. Pearson told the inspector that used oil is generated from machine maintenance in the plant, and is shipped off-site to Badger Disposal. Mr. Amcor allowed the inspector access to the facility to conduct the inspection.

Site Tour

The walk-through began in the Grid Application Department at press number 17. Mr. Wall showed Inspector Francis a 55-gallon satellite area accumulation area (SAA) container of lacquer

waste and waste toluene in the Grid Enclosure. Inspector Francis asked Mr. Wall about how used rags are handled. Mr. Wall explained that used rags are picked up for laundering by ITT Company, Madison, Wisconsin. The inspection continued to the Maintenance Shop. Mr. Pearson showed Inspector Francis four 55-gallon containers labeled as "Waste Oil" (see photograph number 1). Mr. Pearson also showed Inspector Francis an area in the Maintenance Shop where used fluorescent lamps are accumulated. The inspection continued to the Amcor solvent storage room. Mr. Pearson and Mr. Wall showed Inspector Francis two 55-gallon containers of hazardous waste. Inspector Francis observed a 55-gallon container of hazardous waste from the Grid Room, with a 1/13/2009 accumulation date. The second 55-gallon container was labeled "Ink Waste". The inspection continued to the rotogravure printing area. Mr. Pearson showed Inspector Francis the SAA containers in the rotogravure printing area, and pointed out that Amcor can print up to nine colors. The inspection continued to the "Clean Up Room". Mr. Pearson showed Inspector Francis the solvent wash tank, dirty solvent accumulation tank, reclaimed solvent tank, distillation unit, 55-gallon drum washer, and a 55-gallon SAA container of hazardous waste from the distillation bottoms. Mr. Glenn Wohlers pointed out the recovered solvent tank and 55-gallon container of distillation bottoms. The inspection continued to the on-site Laboratory, where Mr. Pearson pointed out a 5-gallon SAA container.

Mr. Pearson and Mr. Wall provided Inspector Francis with hazardous waste manifests from 2009, 2008, 2007, 2006, and 2005, non-hazardous waste manifests, universal waste off-site shipment information and current waste profiles in the on-site laboratory. The last shipment of hazardous waste was on 1/13/2009, and the last shipment of used fluorescent lamps was on 12/11/2008. Inspector Francis and Mr. Pearson then returned to the conference room to review other records.

Records Review

A record review was conducted. Inspector Francis requested to review the contingency plan, and training record documentation for Amcor. Mr. Pearson provided the inspector with training records, a 2008 copy of the contingency plan. Hazardous waste training was last offered on November 19, 2008.

Closing Conference

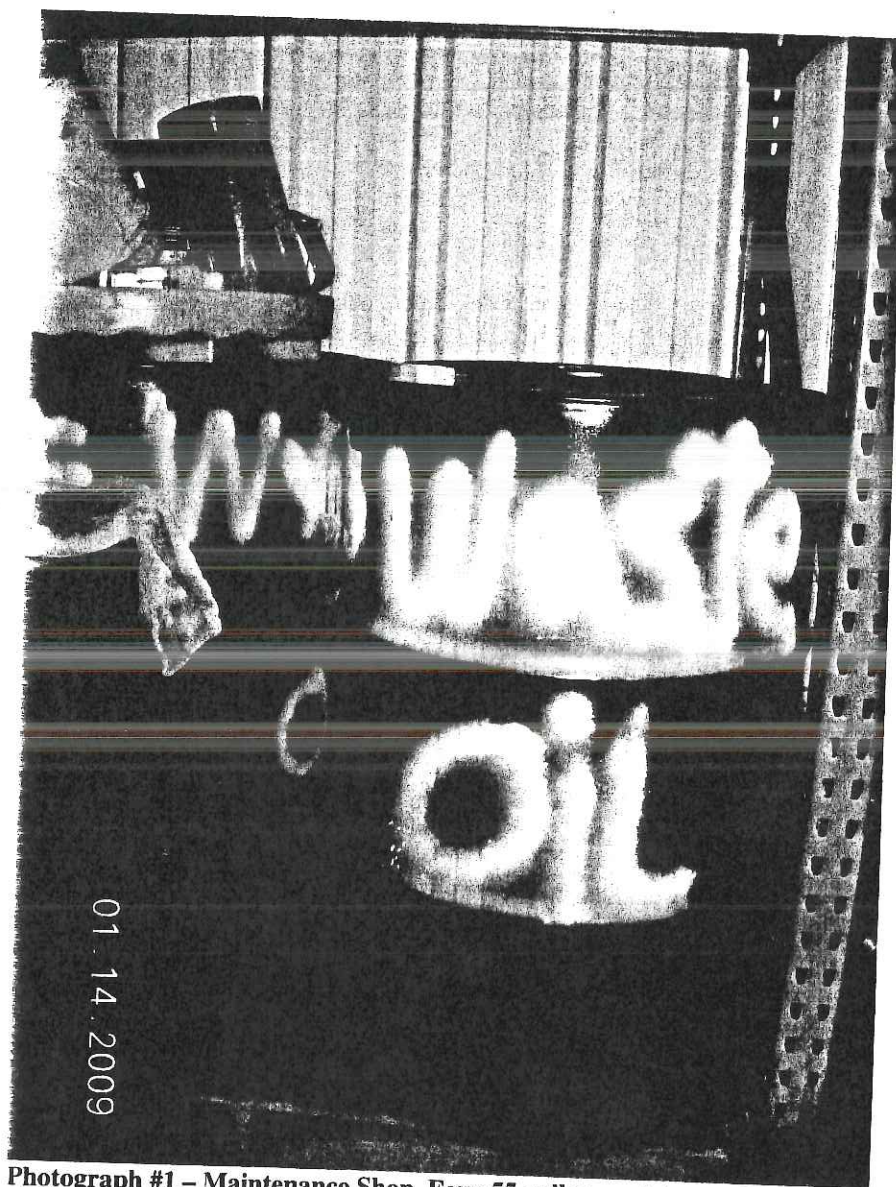
The inspector conducted a closing conference. Inspector Francis explained that he would review his notes from the inspection, and generate an inspection report. Amcor would then receive a letter from U.S. EPA regarding the inspection including a copy of the inspection report, completed inspection checklists and a copy of the photograph taken during the inspection. Inspector Francis notified Mr. Pearson that he had concerns about the labeling of used oil containers in the Maintenance Shop, and several "Waste Ink" waste containers. Also, Inspector Francis mentioned that he would follow up with the WDNR regarding the manifest tracking system entries for off-site shipments of F006 and D003 wastes.

Attachments

Inspection Checklists.

Photographs.

Amcor Flexibles, Inc.
Madison, Wisconsin
1/14/2009



Photograph #1 – Maintenance Shop, Four 55-gallon containers of Used Oil.

bcc: Peter Felitti, C-14J ORC

Section A: Inspection Information

Inspection Date(s): 1/14/09	DNR Region: SC	DNR Inspector(s): Walt Francis, U.S. EPA
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Section B: Generator Information

Generator Name Amcor Flexibles, Inc.	EPA ID Number WID 006 115 828	Facility ID (FID) Number 113062950	
Street Address 4101 Lien Rd.	City Madison	ZIP Code 53704	County Dane
Generator Contact Name Mark Pearson	Title Manufacturing Director	Telephone Number (include area code) 608-243-7223	
E-Mail Address: mark.pearson@amcor-flexibles.com			

Legal Owner Name Amcor Flexibles, Inc.	Telephone Number (include area code) 847-362-9000		
Street Address 1919 S. Butterfield Rd.	City Mundelein	State IL	ZIP Code 60060
Personnel Present Mark Pearson	Title Manufacturing Director		
Personnel Present Joel Wall	Title Shipping/Warehouse Manager		

Generator's Main Product or Process

Amcor Flexibles is a printer of coated paper and film based flexible packaging.

Section C: Waste Information

Description of Waste Generated	Hazardous Waste Code	Generation Rate lbs/month	Receiving Facility	Analysis (Date)	Generator Knowledge (✓)
Spent Non-Halogenated solvents	F005	12,000	WID988580056		<input checked="" type="checkbox"/>
Waste acetone	F003/D001	varies	" "		<input checked="" type="checkbox"/>
					<input type="checkbox"/>
					<input type="checkbox"/>

Note: All "NR" References are Wisconsin Administrative Code Chapters

NR 615.06(3)	1. Has a hazardous waste determination been made on each solid waste generated? Check the appropriate means of the determinations: <input checked="" type="checkbox"/> Lab Analysis <input checked="" type="checkbox"/> Generator knowledge (specify):	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
NR 605.12(1)	2. Were waste samples analyzed by certified, registered, or approved laboratories under NR 149? If YES, provide lab names and certification numbers.	<input type="checkbox"/> Yes <input type="checkbox"/> No <i>N/A</i>
NR 615.06(4)	3. Has a new waste analysis been made if the process generating the hazardous waste changed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
NR 615.06(5)	4. Does the generator keep records of all waste determinations on-site for at least three years from the date the waste was last sent to a storage, treatment or disposal facility?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
NR 615.07(2)	5. Has the generator submitted a notification form and obtained an EPA ID#? Note: A subsequent notification should be submitted when there is an ownership or name change.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Section D: Manifest Requirements and Off-Site Shipments

NR 615.08(1)	1. Does the generator initiate a manifest with all off-site shipments of hazardous waste?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
NR 615.08(8)	2. Is the manifest complete?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

NR 615.08(3)	3. Does the manifest specify an approved facility to receive the waste?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
NR 615.08(6)	4. Does the generator send a copy of the manifest to the Department and the receiving state within 5 business days of shipment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
NR 615.11(10)	5. Does the generator send a copy of the consignment state's manifest signed by the receiving facility to the Department within 5 business days of receipt?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
NR 615.08(7)	6. Are copies of all manifests for the past 3 years retained on-site and available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
NR 615.10(1) and (2)	7. Is the hazardous waste packaged, marked and labeled according to DOT requirements?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>1-556m container</i>
NR 615.10(3)	8. Does the generator offer the initial transporter appropriate placards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Section E: Land Disposal Restrictions

NR 675.07	1. Has the generator determined if each waste is prohibited from land disposal? <input checked="" type="checkbox"/> Lab analysis <input checked="" type="checkbox"/> Generator knowledge	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
NR 675.06	2. Does the generator comply with the prohibition against dilution of wastes?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
NR 675.07(1)	3. Does the generator provide notification to the off site facility with each shipment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
NR 675.07 (1)	4. Check the appropriate type of LDR notification: <input type="checkbox"/> Waste is subject to an EXEMPTION from a prohibition (i.e. case-by-case variances, NR 675.05(2) exemption, nationwide capacity variance) <input type="checkbox"/> Waste MEETS treatment standards; certification that wastes may be land disposed without further treatment <input checked="" type="checkbox"/> Waste EXCEEDS treatment standards; notice of appropriate treatment and applicable prohibitions	
NR 675.07 (1)(j)	5. Does the generator retain a copy of LDR notifications and certifications for 5 years?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
NR 675.09 (1)	6. Have underlying hazardous constituents been identified for characteristic wastes?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
NR 675.09(2)	7. If the waste is both a listed and characteristic waste, are all of the treatment standards for the characteristic waste included in the treatment standards for the listed waste?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
NR 675.09(2)	8. If NO to No. 7, are the additional treatment standards for the characteristic waste identified?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
NR 675.20(4)	9. Are wastes with different treatment standards for a constituent of concern mixed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
NR 675.20(4)	10. If YES to No. 9, is the most stringent treatment standard selected?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A

Section F: Reporting

NR 615.11(1)	1. Have annual reports covering generator activities during the previous calendar year been submitted to the Department by March 1 of the following year?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
NR 615.11(2)	2. Are procedures for exception reporting followed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <i>General</i>

Section G: Preparedness and Prevention

NR 630.21(2)	1. Is the generator equipped with ALL of the following, unless it can be shown that the equipment is not necessary for the types of wastes handled? <input checked="" type="checkbox"/> A device to summon emergency assistance (e.g., telephone, 2 way radio) <input checked="" type="checkbox"/> Internal communications and alarm systems <input checked="" type="checkbox"/> Portable fire extinguishers <input checked="" type="checkbox"/> Fire control equipment, including special extinguishing equipment <input checked="" type="checkbox"/> Adequate spill control equipment - <i>3</i> <input checked="" type="checkbox"/> Decontamination equipment (e.g., eyewash, shower)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
NR 630.21(4)	2. Is all of the above emergency equipment tested and maintained to assure its proper operation in an emergency?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
NR 630.21(3)	3. Is there immediate access to internal or external alarms in hazardous waste handling areas?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

4. Has the generator made necessary arrangements with the following emergency organizations?

- ☒ Primary and support roles have been defined if multiple police and fire departments could respond to an emergency
☒ Familiarize police, fire and emergency response teams with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes
☒ Agreements with emergency response contractors and equipment suppliers to provide response *by fire dept.*
☒ Familiarize local hospitals with the properties of wastes handled and the potential resulting injuries or illnesses *by car*

☐ Yes ☐ No

NR 630.21(6)

5. Is adequate aisle space provided throughout the site to allow for the unobstructed movement of personnel and all emergency equipment?

☒ Yes ☐ No

NR 630.21(5)

Section H: Contingency Plan

1. Does the generator have a written contingency plan or an amended SPCC plan that will be implemented immediately in the event of a fire, explosion or hazardous waste discharge? *12/31/02 2009*

☒ Yes ☐ No

NR 630.22(1)(a)

2. Has the generator made copies of the contingency plan and all revisions available to ALL of the following?

☐ Department ☐ Police ☒ Fire ☐ Hospital ☐ Emergency response teams

☐ Yes ☒ No

NR 630.22(1)(b)

3. Does the contingency plan need to be amended due to any of the following?

- ☐ Contingency plan failed in an emergency
☐ Change in site design, construction, O&M, or other circumstances which affected emergency response
☐ Emergency coordinators changed
☐ Emergency equipment changed

☐ Yes ☒ No

NR 630.22(1)(c)

4. Does the plan identify an emergency coordinator who meets ALL of the following?

- ☒ Is available at all times to respond to emergencies at the site
☒ Is familiar with all aspects of site activities and the contingency plan
☒ Has authority to commit the resources needed to carry out the contingency plan

☒ Yes ☐ No

NR 630.22(1)(d)

5. Does the contingency plan include ALL of the following information?

- ☒ A designation of the primary and alternate emergency coordinator, if more than one person is listed
☒ The name, position, address and phone number, office and home, for each emergency coordinator
☒ A description of the site layout, types of wastes handled and associated hazards, places where employees work, and entrances (roads) accessing the site
☒ An evacuation plan for personnel including signal(s) to be used in the event of evacuation and alternate routes
☒ Procedures to notify local police, fire, hospitals, and emergency response teams in the event of a fire, explosion, or hazardous waste discharge
☒ Procedures for emergency shutdown of site operations
☒ A list of emergency equipment at the site, including location, description, and capabilities of each item

☒ Yes ☐ No

NR 630.22(1)(e)

6. Does the plan require the emergency coordinator to do ALL of the following in the event of a fire, explosion, or discharge of hazardous wastes?

- ☒ Activate internal alarms or communication systems
- ☒ Telephone the division of emergency government (1-800-943-0003)
- ☒ Identify the character, source, amount, and extent of discharged hazardous materials
- ☒ Assess hazards to human health and the environment
- ☒ Immediately notify appropriate authorities, as necessary
- ☒ Take all reasonable measures necessary to ensure fires, explosions and discharges do not occur, reoccur, or spread
- ☒ Monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes, or other equipment if the site stops operation
- ☒ Provide for treating, storing, or disposing of recovered waste, contaminated soil, surface water, or other material
- ☒ Ensure wastes that are incompatible with the discharged material are not treated, stored or disposed until cleanup is completed
- ☒ Ensure that emergency equipment is clean and fit for use prior to resuming operations

NR 630.22(2)(a)

☒ Yes ☐ No

7. Will the generator notify the Department and appropriate local authorities prior to resuming operations?

NR 630.22(2)(b)

☒ Yes ☐ No

Section I: Personnel Training Requirements

1. Does the generator have a program of classroom instruction or on-the-job training for personnel in hazardous waste management?

NR 630.16(1)

☒ Yes ☐ No

2. Are the following applicable items included in the training program?

- ☒ Contingency plan implementation
- ☒ Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment
- ☒ Key parameters for automatic waste feed cut-off systems
- ☒ Communications and alarm systems
- ☒ Response to fires or explosions
- ☒ Response to groundwater contamination incidents
- ☒ Shutdown of operations

NR 630.16(1)

☒ Yes ☐ No

3. Are new employees trained within 6 months of their assignment?

NR 630.16(2)

☒ Yes ☐ No

4. Do personnel take part in an annual review of the training?

NR 630.16(3)

☒ Yes ☐ No

5. Are ALL of the following training documents kept on-site for at least 3 years from each employee's last date of employment?

- ☒ Job titles and the employee name for each position related to hazardous waste management
- ☒ Job description of each of the above job titles
- ☒ Description of the amount and type of training that will be given to each employee
- ☒ Records that required training has been given to each employee

NR 630.16(4)

☒ Yes ☐ No

Section J: 90-Day Container Accumulation

1. Does the generator accumulate hazardous waste in containers? If NO, go to Section K.

NR

615.05(4)(a)5.

☒ Yes ☐ No

2. Are the containers marked with the starting date of accumulation?

NR

615.05(4)(a)6.

☒ Yes ☐ No

3. Are the containers accumulated for 90 days or less?

NR

615.05(4)(a)10.

☒ Yes ☐ No

4. Are containers marked with the words "Hazardous Waste"?

NR

615.05(4)(a)2.d.

☐ Yes ☒ No

5. Are all containers of hazardous waste in good condition?

NR

615.05(4)(a)2.j.

☒ Yes ☐ No

6. Are all containers made of or lined with materials that are compatible with the waste?

NR

615.05(4)(a)2.e.

☒ Yes ☐ No

7. Are all containers kept closed, except when it is necessary to add or remove waste?

NR

615.05(4)(a)2.f.

☒ Yes ☐ No

8. Are containers opened, handled or stored to prevent leaks or ruptures?

☒ Yes ☐ No

615.05(4)(a)2.b.	9. Are containers and accumulation areas inspected weekly for leaks and defects?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
NR 615.05(4)(a)2.c.	10. Are the inspections recorded into a log which includes ALL of the following? <input type="checkbox"/> Date and time of inspection <input type="checkbox"/> Name of inspector <input type="checkbox"/> Notation of the observations made <input type="checkbox"/> Date and nature of repairs or remedial actions	<input type="checkbox"/> Yes <input type="checkbox"/> No
NR 615.05(4)(a)2.c.	11. Are the inspection records kept for at least 3 years from the date of the inspection?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
NR 615.05(4)(a)2.g.	12. Are containers of ignitable or reactive waste located at least 50 feet from the property line?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
NR 640.15(1)	13. Are containers of incompatible wastes separated or protected from each other by a physical barrier (dike, berm, wall or other device)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
NR 640.15(2)(b)	14. Are incompatible wastes stored in separate containers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
NR 640.15(2)(a)	15. Are containers that previously held an incompatible waste properly washed before adding waste?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

Section K: Satellite Accumulation

	1. Does the generator accumulate waste at or near the generation point? If NO, go to Section L.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
NR 615.05(4)(c)1.	2. Are the containers in good condition?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
NR 615.05(4)(c)2.	3. Are the containers always kept closed except when it is necessary to add or remove waste?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>clean up now opened.</i>
NR 615.05(4)(c)3.	4. Are containers opened, handled or stored to prevent leaks or ruptures?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
NR 615.05(4)(c)4.	5. Does the generator accumulate no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
NR 615.05(4)(c)5.	6. Are the containers marked "hazardous waste" or other words that identify the contents?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>+ 55 clean up now</i>
NR 615.05(4)(c)6.	7. Are the containers immediately marked with the date the excess amount is generated?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
NR 615.05(4)(c)6.	8. Does the generator comply with the 90 day accumulation requirements with respect to the excess amount within 3 days of it being generated?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Section L: Waste Minimization

NR 615.09(2)	1. Does the generator include waste minimization information in the annual report?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
NR 615.09(1)(a)	2. Does the generator have a program in place to reduce the volume or quantity and toxicity of waste to an economically practicable degree? <i>SPCL</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
NR 615.09(1)(b)	3. Does the generator have a written waste minimization/pollution prevention plan, as recommended by EPA guidance?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
NR 615.09(1)	4. Is evidence gathered during the inspection to justify the generator's waste minimization certification on the manifest?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Section M: Treatment with Absorbent Materials

NR 615.05(5)	1. Does the generator combine absorbent material with waste for the purpose of eliminating free liquids? If YES, see NR 615.05(5).	<input type="checkbox"/> Yes <input type="checkbox"/> No
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Section N: Universal Waste Management

Are universal wastes generated at the site? If NO, go to Section O.					<input type="checkbox"/> Yes <input type="checkbox"/> No
Waste Type	Quantity Generated	On-Site Storage Method	On-Site Treatment (List)	Shipped to handler/destination facility (List)	
<i>used motor</i>	<i>65,000 gal</i>	<i>above</i>	<i>—</i>	<i>pick up, waste</i>	

N Management of CRTs and antifreeze as per department guidance should also be discussed with the generator.

N J Such. II	1. Does the generator comply with the small quantity handler requirements if <5,000 kg/yr is accumulated?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
NR 690 Subch. III	2. Does the generator comply with the large quantity handler requirements if >5,000 kg/yr is accumulated?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A

NR 690.04(2) 3. If the universal waste is not recycled, has the generator complied with the applicable NR 600-685 requirements? ☐ Yes ☐ No ☒ N/A

Section O: Generator Status Evaluation

1. Is the Large Quantity Generator status confirmed by this inspection? ☒ Yes ☐ No

2. If No, what is the correct generator classification?

☐ Non-Generator ☐ Very Small Quantity Generator ☐ Small Quantity Generator

3. Are there any other on-site hazardous waste activities at the generator's location? ☐ Yes ☒ No

4. If YES, check all that apply.

☐ Accumulation in Tanks ☐ Recycling ☐ Transfer ☐ Transporter ☐ Treatment ☐ Storage ☐ Disposal

Inspection Comments. Add comments on additional pages if necessary.

SEE Inspection Report.

DNR Inspector Signature:

Wendy J. [Signature]

Date:




1/14/09

Inspection Checklist for Subpart CC: Air Emission Standards (Containers)

Item # 40 CFR:

CC-1	265.1080	Do any of the following exclusions apply? If yes, please circle.	YES	NO
<p>Applicability: The air emission requirements apply to units subject to subpart I * unless the following apply (circle if applicable):</p> <ol style="list-style-type: none"> 1. Waste was placed in unit prior to Oct. 6, 1996, and none has been added since. 2. The container capacity is less than .1 cubic meter (26 gallons) 3. A unit (e.g. tank) has stopped adding waste and is undergoing closure 4. The unit is used solely for onsite treatment or storage as a result of remedial activities required under corrective action, Superfund, or other similar state program 5. The unit is used solely to manage radioactive mixed waste 6. The unit is regulated by and operates in accordance with Clean Air Act regulations <p>*Note: 1. Satellite containers are exempt 2. CESQG's and SQG's are exempt</p>				
CC-2	265.1083	Do any of the following exemptions apply? If yes, please circle	YES	NO
<p>General Standards: The owner/operator must control air emissions from waste management units except the unit is exempt if (please circle if applicable):</p> <ol style="list-style-type: none"> 1. All hazardous waste entering the unit has an average VO concentration at the point of origination less than 500 parts per million by weight (waste determination required) 2. The organic content of all waste entering the unit has been reduced by one of the 8 acceptable destruction or removal processes. 3. The unit is a tank used for certain biological treatment 4. The hazardous waste placed in the unit meets the LDR numerical concentration limits or has been treated using the specified LDR treatment technology (for organics) 5. The unit is a tank used for bulk feed to an incinerator and meets certain requirements 				
CC-3	265.1084	Waste Determination:	Determination Not Needed	Determination Needed
<p>Was the VO concentration properly determined for each waste which the facility manages in a unit which does not meet Subpart CC requirements? The concentration must be determined by either direct measurement or knowledge. Please see 265.1084 for specific requirements for measurement and knowledge. Determination is <u>not</u> needed for waste managed in containers which meet standards. It may be necessary to evaluate container management prior to requiring VO concentration determination.</p>				

#	NA=Not Applicable, NI=Not Inspected, OK= In Compliance, DF= Deficiency	NA	NI	OK	DF
CONTAINER MANAGEMENT 265.1087					
	Level 1	Level 2	Level 3		
	Larger than 26.4 gallons and less than or equal to 122 gallons, or larger than 122 gallons and do not manage H.W. in light material service	Larger than 122 gallons and manage H.W. "in light material service" (definition at 265.1081)	Larger than 26.4 gallons and treat H.W. by a stabilization process		
CC-4	265.1087	Controls			
<p>One of the following:</p> <ul style="list-style-type: none"> -Use containers that meet DOT requirements -Use a cover and control with no visible gaps, holes or other open spaces into the interior of the container -Use organic vapor suppression on or above the container <p>265.1087(c)</p>		<p>One of the following:</p> <ul style="list-style-type: none"> -Use containers that meet DOT requirements -Use containers that operate with no detectable emissions (method 21) -Use containers that are demonstrated to be vapor-tight within the last 12 months (method 27) <p>265.1087(d)</p>		<ul style="list-style-type: none"> -Containers used to stabilize H.W. with volatile organics greater than 500 ppm -For waste stabilized in a container either: <ol style="list-style-type: none"> 1. container must be vented directly to a control device; or 2. container is vented inside an enclosure which is exhausted through a closed vent to a control device -Conservation vents are not allowed <p>265.1087(b)(2)</p>	

Level 1			Level 2		Level 3			
#	NA=Not Applicable, NI=Not Inspected, OK= In Compliance, DF= Deficiency		NA	NI	OK	DF		
CC -5	265.1087	Waste transfer requirements						
No waste transfer requirements apply			-Waste transfer requirements apply regardless of container alternative used in level 2 -Transfer waste into or out of a container in such a manner as to minimize exposure of the waste to the atmosphere. Acceptable methods include a submerged fill pipe, vapor recovery system, or fitted opening with a line purge 265.1087(b)(3)		Not applicable			
CC-6	265.1087	Operating requirements						
The covers, openings, and closure devices should be closed except: <ol style="list-style-type: none"> 1. When transferring H.W. in and out of the containers 2. between batch transfer not exceeding 15 minutes between transfer (note: if the person performing the transfer leaves the area, or the process shuts down, the container must be closed) 3. While performing sampling and equipment access 4. Conservation and safety vents are allowed -Containers may be open while performing sampling or equipment access -Safety valves and conservation vents may be used if normally left in close position -A cover need not to be on a RCRA empty container, as defined in 40 CFR 261.7 265.1087(c)(3), (d)(3)					-If the vapors are directly vented to a control device, there are specific design and operating criteria that must be met same as tanks that have closed vent and control device systems -If an enclosure is used, the enclosure must meet the design and operating criteria specified in "Procedure T-Criteria for and Verification of a Permanent or Temporary Total Enclosure" under 40 CFR 52.741 The container, enclosure, control device or closed vent system may have safety relief devices.			
CC-7	265.1089	Inspection requirements						
Minimal inspection required: <ul style="list-style-type: none"> - when facility accepts container and it is not emptied within 24 hours -if wastes are stored greater than a year, then visually inspect once a year If inspections are required, facility must develop written plan and schedule to perform inspection 265.1087(c)(4), (d)(4)					Inspection requirements are the same as for tanks			
CC- 8	265.1087	Repair requirements						
When a defect is detected; attempt to repair within 24 hours must be made and: <ol style="list-style-type: none"> 1. Repair within 5 calendar days or empty and remove the container from service 2. Do not use until defect is repaired 265.1087(c)(4), (d)(4)					Necessary corrective measures shall be <u>immediately</u> implemented to ensure that the control device is operated in compliance			
CC- 9	265.1090	Recordkeeping requirements						
-If container exceeds 122 gallons and does not meet DOT standards, records indicating that the container is not managing H.W. in light material service			Since Level 2 waste is "in light material service", no records need to be kept		Depends upon how the organic emissions are vented: -If an enclosure is used, records must be maintained for the most recent set of calculations and measurements performed to verify that the enclosure meets the criteria of a permanent total enclosure (Procedure T) -Records for the closed vent and control device system are the same for those used on tanks(265.1090)(e)			

Comments: